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Attorneys for Defendant
VIRK PROPERTIES, INC.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

GEORGE AVALOS, an
individual,

Plaintiff,

v.

VIRK PROPERTIES, INC.,
a California corporation; and
DOES 1-10, inclusive,

Defendants.

Case No.: 1:20-cv-01601-NONE-EPG

Hon.

JOINT STIPULATION FOR
DISMISSAL OF THE ENTIRE
ACTION WITH PREJUDICE

Complaint Filed: November 13, 2020
Trial Date: None

TO THE COURT AND ALL PARTIES:

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiff GEORGE AVALOS (“Plaintiff”) and VIRK PROPERTIES, INC. (“Defendant”), stipulate and jointly request that this Court enter a dismissal with prejudice of Plaintiff’s Complaint in the above-entitled action, in its entirety. Each party shall bear his or its own attorneys’ fees, expert fees, and costs.

IT IS SO STIPULATED.

Respectfully submitted,

DATED: February 11, 2021

MANNING LAW, APC

By: /s/ Joseph R. Manning, Jr.

Joseph R. Manning, Jr.
Attorney for Plaintiff
George Avalos

DATED: February 11, 2021

BRUCE A. NEILSON, ATTORNEY

By: /s/ Bruce A. Neilson

Bruce A. Neilson
Attorneys for Defendant
Virk Properties, Inc.

Certification Pursuant to Local Rule 5-4.3.4(a)(2)(i)

Pursuant to Local Rule 5-4.3.4(a)(2)(i), I, Joseph R. Manning, Jr., hereby do attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing’s content and have authorized the filing.

DATED: February 11, 2021

By: /s/ Joseph R. Manning, Jr.